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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TODD TYLER GRAY,

Defendant.

INDICTMENT

Count 1: 18 U.S.C. § 2251(a), (e):
Attempted Production of Child
Pornography

Count 2: 18 U.S.C. § 2422(b): Coercion
and Enticement/Attempted Coercion and
Enticement

Count 3: 18 U.S.C. § 2252A(a)(2), (b):
Attempted Receipt of Child Pornography

Case: 2:23-cr-00172
Assigned To : Barlow, David
Assign. Date : 5/2/2023

The Grand Jury Charges:

COUNT I

18 U.S.C. § 2251(a), (e)
(Attempted Production of Child Pornography)

On or about April 6, 2023, in the District of Utah,

TODD TYLER GRAY,

defendant herein, did attempt to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; all in violation of 18 U.S.C. § 2251(a) and (e).

COUNT 2

18 U.S.C. § 2422(b)
(Attempted Coercion and Enticement)

On or about April 6, 2023, in the District of Utah,

TODD TYLER GRAY

defendant herein, using a facility or means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce any individual who has not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, and attempted to do so, namely, rape of a child in violation of Utah code 76-5-402.1 and sodomy on a child in violation of Utah code 76-5-403.1; all in violation of 18 U.S.C. § 2422(b).

COUNT 3

18 U.S.C. § 225A(a)(2), (b)
(Attempted Receipt of Child Pornography)

On or about April 6, 2023, in the District of Utah,

TODD TYLER GRAY,

defendant herein, did knowingly attempt to receive child pornography and material containing child pornography using a means and facility of interstate and foreign commerce and that has been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; all in violation of 18 U.S.C. § 2252A(a)(2) and (b).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 2253, upon conviction of any offense violating 18 U.S.C. § 2251 or 2252A, the defendant shall forfeit to the United States of America: (i) any visual depiction described in 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of this chapter; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Pursuant to 18 U.S.C. § 2428, upon conviction of any offense violating 18 U.S.C. § 2422, the defendant shall forfeit to the United States of America (i) such person's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and (ii) any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation.

- Google Cell phone
- Substitute property as allowed by 21 U.S.C. § 853(p) and 18 U.S.C. § 2253(b)

A TRUE BILL:

151

FOREPERSON OF GRAND JURY

TRINA A. HIGGINS
United States Attorney



JOEY L. BLANCH
Assistant United States Attorney